



**Mark S. Melodia**  
Direct Phone: +1 212 205 6078  
Email: mmelodia@reedsmit.com

Reed Smith LLP  
599 Lexington Avenue  
New York, NY 10022-7650  
+1 212 521 5400  
Fax +1 212 521 5450  
reedsmit.com

August 6, 2018

**VIA ECF**

The Honorable Steven C. Mannion  
United States Magistrate Judge  
United States District Court  
District of New Jersey  
Martin Luther King Building &  
U.S. Courthouse  
50 Walnut Street Room 4015  
Newark, NJ 07101

**RE: *White, et al. v. Samsung Electronics America, Inc., et al.*,  
U.S.D.C., D.N.J., No. 2:17-cv-01775-MCA-SCM**

Dear Magistrate Judge Mannion:

I am counsel for Sony Electronics Inc. in the above-captioned case. In advance of the Telephone Status Conference scheduled for August 14, 2018 at 3:30 PM ET, I respectfully submit a brief agenda letter on behalf of all parties.

Defendants' Motion to Dismiss (Dkt. No. 54) remains pending before Judge Arleo. Pursuant to stipulation of the parties (Dkt. No. 70-1), this Court previously ordered "that all discovery in this matter shall be stayed pending further order of the Court after a decision ruling on Defendants' motion to dismiss" (Dkt. No. 72).

Plaintiffs' counsel wishes to note that, as he mentioned previously to the Court, he has another client who is a New Jersey individual who owns a Samsung Smart TV who would like to join the litigation as a representative plaintiff; Plaintiffs' counsel does not expect to seek or obtain leave to add such an individual as a representative plaintiff until after the ruling on the motion to dismiss.

August 6, 2018  
Page 2

ReedSmith

We also note there have been recent exchanges amongst parties regarding Plaintiffs' Request for Judicial Notice (Dkt. No. 76). Defendants Sony Electronics Inc. (Dkt. No. 77) and Samsung Electronics America, Inc. (Dkt. No. 78) have submitted responses requesting the Court to deny the Request for Judicial Notice.

As directed by the Court (Dkt. No. 75), Plaintiffs' counsel shall initiate the call for the Telephone Status Conference.

We thank the Court for its consideration of this submission.

Respectfully submitted,

/s/ Mark S. Melodia  
Mark S. Melodia

cc: All Counsel of Record (*via ECF*)